

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

**VIRGILIO MARTINEZ, Individually and
on Behalf of All Others Similarly Situated,**

Plaintiff,

-against-

**COVENANT AVIATION SECURITY
CORPORATION, COVENANT SECURITY
SERVICES, LTD., COVENANT AVIATION
SECURITY, LLC, and ROBERT L. COE,
Jointly and Severally,**

Defendants.

ECF Case

11-cv-4952 (BMC)

**NOTICE OF PLAINTIFFS’
UNOPPOSED MOTION FOR
APPROVAL OF ATTORNEYS’
FEES AND REIMBURSEMENT
OF EXPENSES**

For the reasons set forth in the Memorandum of Law in Support of Plaintiffs’ Unopposed Motion for Approval of Attorneys’ Fees and Reimbursement of Expenses (“Motion for Attorneys’ Fees”), and in the Declaration of Brent Pelton in Support of Plaintiffs’ Unopposed Motion for Attorneys’ Fees and Reimbursement of Expenses and the supporting exhibits attached thereto, Plaintiffs respectfully request that the Court enter an Order:

- (1) awarding Class Counsel attorneys’ fees of one-third (33.33%) of the Settlement Fund;
- (2) awarding Class Counsel costs of \$963.26; and
- (3) granting such other, further, or different relief as the Court deems just and proper.

Dated: New York, New York
April 25, 2012

Respectfully submitted,

PELTON & ASSOCIATES, PC
Attorneys for Plaintiffs

By: /s/Brent E. Pelton
Brent Pelton [BP-1055]

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